

**STEVENS & LEE P.C.**

485 Madison Avenue  
New York, New York 10022  
Nicholas F. Kajon  
(212) 537-0403  
(610) 371-1223 (fax)  
nfk@stevenslee.com

*Attorneys for Legacy Capital Ltd.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

LEGACY CAPITAL LTD. and KHRONOS LLC,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05286 (SMB)

**CERTIFICATE OF SERVICE**

I, Nicholas F. Kajon, hereby certify that on September 18, 2015, I caused to be served a true and correct copy of Legacy Capital Ltd.'s Reply Memorandum of Law in Further Support of Its Motion to Dismiss the Amended Complaint Under Federal Rule of Bankruptcy Procedure

DOCSNY-592044 v1

7012(b) and Federal Rule of Civil Procedure 12(b)(6) (the “**Reply Brief**”), via e-mail on the following:

Marc E. Hirschfield  
David J. Sheehan and  
Oren Warshavsky  
Jason S. Oliver  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
mhirschfield@bakerlaw.com  
dsheehan@bakerlaw.com  
owarshavsky@bakerlaw.com  
joliver@bakerlaw.com  
bhaa@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff*

Eric B. Fisher  
Barry N. Seidel  
Dickstein Shapiro LLP  
1633 Broadway  
New York, NY 10019  
fishere@dicksteinshapiro.com  
seidelb@dicksteinshapiro.com  
*Attorneys for Khronos LLC*

Notice of filing of the Reply Brief was provided by operation of the Case Management/Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York (the “**CM/ECF System**”) upon registered users of the CM/ECF System.

Dated: New York, New York  
September 18, 2015

s/Nicholas F. Kajon  
Nicholas F. Kajon